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SOUTHWEST GAS CORPORATION ECEIVED

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AZ CORP COMMISSION DOCKET CONTROL

April 5, 2012

Docket Control Arizona Corporation Commission 1200 West Washington Street Phoenix, AZ 85007-2996

Subject:

Southwest Gas Corporation's Gas Heat Pump Technology

Reimbursement Plan, G-01551A-10-0458, D.72723

In compliance with Decision No. 72723, Southwest Gas Corporation hereby files an original and thirteen (13) copies of its Gas Heat Pump Technology Development Reimbursement Plan.

If you have any questions, please contact me at (702) 876-7163.

Respectfully,

Debra S. Gallo by omes

Debra S. Gallo, Director Government & State Regulatory Affairs

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Arizona Corporation Commission

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Gas Heat Pump Technology Development Reimbursement Plan

SOUTHWEST GAS CORPORATION GAS HEAT PUMP TECHNOLOGY DEVELOPMENT REIMBURSEMENT PLAN

SUMMARY

Pursuant to the settlement agreement that was approved by the Arizona Corporation Commission (ACC or Commission) in Decision No. 72723, Southwest Gas committed to:

- Prepare an accounting for all gas heat pump (GHP) technology development costs that have been funded by Arizona ratepayers through base rates and the research and development (R&D) surcharge;
- Track the Arizona funding for GHP technology development costs as a potential regulatory liability, to be
 returned to ratepayers, only to the extent commercial development occurs and revenues and royalties
 are received by Southwest Gas and profits and royalties are received by any other entities that are
 affiliated with Southwest Gas including but not limited to IntelliChoice Energy LLC (ICE); and
- Prepare a plan to reimburse Arizona customers for their proportionate level of funding of GHP technology
 development costs. This plan will include a methodology for how the benefits of any commercialization
 revenues and royalties associated with the gas engine driven air conditioning units (referred to in this
 document as GEDAC) are to be shared with Southwest Gas' Arizona ratepayers to ensure that customers
 receive credit for any investment that contributed to the development of this technology.

Southwest Gas' compliance with the Commission's decision is described below. The attached worksheet provides supporting calculations for the amounts described in this filing and includes the proposed model to be used for calculating any reimbursement to Arizona customers.

ACCOUNTING FOR GHP TECHNOLOGY DEVELOPMENT COSTS

An accounting of the GHP technology development costs is provided on the attached worksheet. Southwest Gas began incurring development costs in 2002. However, costs associated with GHP technology development have only been included in Southwest Gas' Arizona rates since January 1, 2005, when Southwest Gas' Energy Efficient Technology Department (EETD) was created. During the relevant time period, EETD's development of GHP technology consisted of work on two projects: (1) a 10-ton rooftop GEDAC unit; and (2) to a lesser extent an AISIN manufactured gas-powered air conditioning unit. AISIN SEIKI Co., Ltd., a Japanese company, produces and manufactures both an 8-ton and a 15-ton commercial GHP product for heating and cooling applications.

The attached worksheet identifies all GHP technology development costs and calculates the amounts that have been included in Arizona rates. Based upon these calculations, 27 percent of the total costs that were incurred by Southwest Gas through 2011 are attributable to Arizona and are subject to this reimbursement plan. This percentage may change in future years to the extent Southwest Gas incurs additional costs for GHP technology development, but, consistent with the Commission's Decision, no additional costs will be funded by Arizona customers beyond December 31, 2011.

TRACK ARIZONA FUNDING OF GHP AS POTENTIAL REGULATORY LIABILITY

As reflected on the attached worksheet, \$4,402,593 of the total GHP technology development costs are subject to this reimbursement plan and will be tracked as a potential regulatory liability. This is also the amount that was identified and that will be eligible to be reimbursed to Arizona customers if the conditions of reimbursement set forth in the settlement agreement are satisfied.

PLAN TO REIMBURSE ARIZONA RATEPAYERS FOR THEIR PROPORTIONATE LEVEL OF GHP COSTS

To the extent the conditions of reimbursement set forth in the settlement agreement are satisfied, Southwest Gas proposes to credit Arizona customers \$250 for each 10-ton rooftop GEDAC unit and \$200 for each AISIN GHP unit that is sold by Southwest Gas or any of its affiliates. The credits to Arizona customers will be tracked as a regulatory liability and the balance of the regulatory liability at the end of the test year in Southwest Gas' next general rate case will be amortized (i.e. returned to Arizona customers) over an amortization period that is approximately equal to one rate case cycle. Southwest Gas proposes to account for the regulatory liability through December 31, 2021 or until Southwest Gas no longer has a financial interest in an affiliate that sells either the GEDAC or AISIN GHP units, whichever occurs first.

ACCOUNTING FOR GAS HEAT PUMP (GHP) TECHNOLOGY DEVELOPMENT COSTS PLAN TO REIMBURSE ARIZONA CUSTOMERS - 2011 ENERGY EFFICIENT TECHNOLOGY DEPARTMENT SOUTHWEST GAS CORPORATION

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Profits/Royalties	Rec'd by Affiliates	(f)			0	2	2	2	0	9	0	2	01	0																
GHP Revenue/Royalties	Received by SWG [6]	(0		0	0	0	0	0	0	0	0			9													
2011 Arizona	Percentage	(h)	Ln 13(g)/Ln 13(c)		•												27%													
kates	Arizona	(6)			0	0	0	188,163	471,398	533,689	579,003	823,936	823,936	823,936	4,244,062	158,531	4,402,593 [4]			0	0	0	188,163	554,585	627,870	681,180	1,267,594	1,267,594	1,267,594	5,854,582
Expenditures Recovered in Rates	California	(J)			\$ 0	0	0	33,178	28,201	28,201	28,201	145,862	150,017	154,289	567,951 \$		 •			\$	0	0	33,178	33,178	33,178	33,178	224,404	230,796	237,368	825,280 \$
Expenditure	Nevada	(e)			\$	0	0	108,134	91,914	91,914	91,914	0	0	0	383,874 \$					\$ 0	0	0	108,134	108,134	108,134	108,134	0	0	0	432,534 \$
Shareholder	Funded	(p)		ent [1], [2]	214,425 \$	694,020	2,826,855	1,975,235	1,554,356	1,143,828	955,152	376,213	379,927	584,443	10,704,454 \$					214,425 \$	694,020	2,826,855	1,975,235	1,828,654	1,345,680	1,123,708	578,790	584,504	899,143	12,071,014 \$
Total	Expenditures	(၁)	(d)+(e)+(b)+(d)	EETD Costs Allocated to GHP Development [1], [2]	214,425 \$	694,020	2,826,855	2,304,710	2,145,868	1,797,633	1,654,270	1,346,012	1,353,881	1,562,668	15,900,342 \$	158,531	16,058,873	1		214,425 \$	694,020	2,826,855	2,304,710	2,524,551	2,114,862	1,946,200	2,070,788	2,082,894	2,404,105	19,183,409 \$
	GHP %	(Q)		ts Allocated to	100% \$	100%	100%	100%	85%	85%	85%	65%	65 %	92%	l ↔	thg [3]	ital .	!	[5]	€									ı	↔
	Year	(a)		EETD Cost	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total	AZ R&D Schg [3]	Grand Total		[1] Total EETD [5]	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Total
Line	Š.					7	က	4	2	9	7	∞	တ	10	7	12	13			4	15	16	17	18	19	20	21	52	23	24

^[2] Total EETD costs multiplied by the GHP percentage in column (b).

^[3] Estimated amount included in the Arizona R&D surcharge for the GEDAC Demonstration Project. Final amount will be available in April 2012 when the 2011 Summary Report is filed with the Commission.

^{[4] \$4,402,593} is the maximum potential regulatory liability to be offset with GHP royalties.

^[5] Does not include Arizona R&D surcharge or Nevada UTD dollars. [6] Currently, the royalties to be accounted for by Southwest Gas are \$250 for each GEDAC unit sold and \$200 for each AISIN GHP unit sold.